

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**SUMMARY OF OUTSTANDING ISSUES WITH THE  
DEBTOR'S PRODUCTION OF DOCUMENTS IN RESPONSE  
TO THE DWSD DISCOVERY PARTIES' DOCUMENT REQUESTS**

Assured Guaranty Municipal Corp. ("Assured"), National Public Finance Guarantee Corporation ("National") and Berkshire Hathaway Assurance Corporation ("BHAC") and together with National and Assured, the "DWSD Discovery Parties", in connection with the May 28, 2014 hearing, hereby submit the attached chart summarizing the DWSD Discovery Parties' outstanding issues with the document production of the Debtor, the City of Detroit, Michigan (the "City") in response to the *DWSD Discovery Parties' First Set of Joint Requests for the Production of Documents to Debtor the City of Detroit, Michigan* [ECF No. 4041]. The DWSD Discovery Parties and the City continue to work together to resolve the open document discovery issues as expeditiously as possible, but make this submission to identify the outstanding issues concerning the DWSD Discovery Parties at this time and in light of the May 28, 2014 hearing.

Respectfully submitted,

Dated: May 27, 2014

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